

# Worksheet

## Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior  
Bureau of Land Management (BLM)

NEPA # AZ-DNA-110-2005-0007

---

**Note:** This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy transmitting this worksheet and the Guidelines for Using the DNA Worksheet located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.)

A. **BLM Office:** AZ-010\_\_Arizona Strip    **Lease/Serial/Case File No.** \_\_5051

**Proposed Action Title/Type:** \_\_Diamond Butte Pipeline Extension

**Location of Proposed Action:** \_\_T.37 N., R.10 W. Secs. 27 & 28

**Description of the Proposed Action:** Extend the Diamond Butte Catchment pipeline from where it ends in the NW1/4 of section 28, one mile east to the NW1/4 of section 27 along the toe of the north slope of Diamond Butte. The pipe would be 11/4 inch PE pipe buried approximately 30 inches underground by using a small bulldozer with a ripper tooth. Water would be left at the existing trough for antelope. The new trough at the end of the proposed pipeline would provide water for deer as well as livestock. The proposed water would spread livestock out more along the north and east portions of the allotment and not congregate them in the northwest corner of the allotment as the current water does.

**Applicant (if any):** \_\_Iverson Enterprises, Inc.

### B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name*	<u>Arizona Strip District RMP</u>	Date Approved 07/1992
LUP Name*	_____	Date Approved
Other document**	<u>Shivwits Grazing EIS</u>	Date Approved 1980
Other document**	<u>Shivwits RA Implimentation Plan</u>	Date Approved 1992
Other document**	_____	Date Approved

\*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

\*\*List applicable activity, project, management, water quality restoration, or program plans.

☐ The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions: Under Management Guidance for Grazing Management 1). Make sure that rangeland improvement projects provide multiple-use benefits. 2). Complete EAs on .....site specific rangeland improvement projects. Under Changes In Management—Management Direction: Project proposals described in previous planning

documents would be implemented using the reclamation stipulations in Appendix 5.

---

☐ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

---

---

---

---

---

**C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action.

---

District Wide Water Catchment Program	EA: AZ-010079-173	07/18/1979
Diamond Butte/Little Tank Catchment	EA: AZ-010-86-023	08/1988
Diamond Butte Storage Decision Record	AZ-010-86-086	05/29/1988
Sunshine Allotment Improvements	EA: AZ-010-2004-0017	07/22/2004

---

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

N/A

---

---

---

---

---

**D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

Documentation of answer and explanation:

Yes. This is a continuation of the initial proposed action. This would extend the pipeline to where the permittee originally requested it be located. Funding was not available at the time for the extension. The permittee would now buy the pipe and BLM would install it

---

---

---

---

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?**

Documentation of answer and explanation:

Yes. There have been no new conditions or environmental concerns in this area that would be impacted by implementing the proposal.

---

---

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

Documentation of answer and explanation:

Yes. This action is the same as that described and analyzed in EA-AZ-010-2004-0017 and is a continuation of the project described in EA-AZ-010-1986-023

---

---

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

Documentation of answer and explanation:

Yes. While the original project EA is somewhat outdated, the EA describing and analyzing the the installation of the proposed action is current and appropriate

---

---

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?**

Documentation of answer and explanation:

Yes. This action is no different nor impacts any different than those described in the referenced EA's.

---

---

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

Documentation of answer and explanation:

Yes. Adding one mile of buried pipeline to the existing line would not substantially change the existing analysis. By placing a water source farther to the east and higher on the Butte than the existing water, would only relieve the concentrating of livestock in the northwest corner of the allotment.

---

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Documentation of answer and explanation:

Yes. The initial project was reviewed and constructed in 1990 with no controversy and there was none regarding the pipeline installation EA for the Sunshine allotment in 2004. The Arizona Game and Fish Department's only concern was that water be left at the existing water site for antelope.

---

**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Gloria Benson	Native American Coordinator	Native Americans
Tom Folks	Recreation Team Lead	Recreation
Laurie Ford	Non-renewable resource Team Lead	Lands & Reality
Michael Herder	Wildlife Team Lead	Wildlife
John Herron	Archaeologist	Cultural
Lee Hughes	Botanist	T & E Plants
Ray Klein	Sup. Ranger GCPNM	Law Enforcement
Linda Price	S&G Team Lead	Standards & Guides
Bob Sandberg	Range Team Lead	Range
Ron Wadsworth	Sup. Law Enforcement	Law Enforcement
Bob Sandberg	Public Domain Manager	Management
Richard Spotts	Environmental Coordinator	NEPA

---

**F. Mitigation Measures:** List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

1. Standard mitigation measures for a pipeline will be followed.
  2. No new roads would be constructed
  3. All trash relating to construction would be removed from the site.
  4. The area would be monitored for noxious weeds and any located would be treated.
  5. Any sub-surface archaeological, historical, or paleontological remains discovered during construction, maintenance, or use shall be left intact; all work in the area shall stop immediately and the authorized officer shall be notified immediately. Commencement of work shall be allowed upon clearance by the authorized officer.
  6. An additional archaeological survey would be required in the event the proposed project location is changed or additional surface disturbing activities are added to the project after the initial survey. Any such survey would have to be completed prior to commencement of the project.
- 
- 

## **CONCLUSION**

- ☐ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

---

Signature of the Responsible Official

---

Date

## **Guidelines for Using the DNA Worksheet and Evaluating the NEPA Adequacy Criteria**

These guidelines supplement the policies contained in the Instruction Memorandum entitled “Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy.” During preparation of the worksheet, if you determine that one or more of the criteria are not met, you do not need to complete the worksheet. If one or more of these criteria are not met, you may reject the proposal, modify the proposal, or complete appropriate NEPA compliance (EA, EIS, Supplemental EIS, or CX if applicable) and plan amendments before proceeding with the proposed action.

***Criterion 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?*** Explain whether and how the existing documents analyzed the proposed action (include page numbers). If there are differences between the actions included in existing documents and the proposed action, explain why they are not considered to be substantial.

***Criterion 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?*** Explain whether the alternatives to the current proposed action that were analyzed in the existing NEPA documents and associated records constitute appropriate alternatives with respect to the current proposed action, and if so, how. Identify how current issues and concerns were addressed within the range of alternatives in existing NEPA documents. If new alternatives are being raised by the public to address current issues and concerns, and you conclude they do not need to be analyzed, explain why.

***Criterion 3. Is the existing analysis valid in light of any new information or circumstances?*** If new information or new circumstances, including the items listed below, are applicable, you need to demonstrate that they are irrelevant or insignificant as applied to the existing analysis of the proposed action. New information or circumstances could include the following:

- a. New standards or goals for managing resources. Standards and goals include, but are not limited to, BLM's land health standards and guidelines, recovery plans for listed species prepared by the Fish and Wildlife Service or National Marine Fisheries Service, requirements contained in agency habitat conservation strategies, a biological opinion, or a conference report related to Section 7 of the Endangered Species Act; Environmental Protection Agency water quality regulations for Total Maximum Daily Loads (TMDLs) (40 CFR 130); and the requirement to address disproportionate impacts on minority populations and low income communities (E.O. 12898).
- b. Changes in resource conditions within the affected area where the existing NEPA analyses were conducted, for example, changes in habitat condition and trend; changes in the legal status of listed, proposed, candidate, and BLM-designated sensitive species; water quality, including any identified impaired water bodies under Section 303 of the Clean Water Act; air quality; vegetation condition and trend; soil stability; visual quality; cultural resource condition; wildlife population trend(s); etc.

- c. Changes of resource-related plans, policies, or programs of State and local governments, Indian tribes, or other Federal agencies, such as, State- or Environmental Protection Agency-approved water quality restoration plans.
- d. Designations established in the affected area since the existing NEPA analysis and documentation was prepared. Designations include, but are not limited to, designated wilderness, wilderness study areas, National Natural Landmarks, National Conservation Areas, National Monuments, National Register properties, Areas of Critical Environmental Concern, Research Natural Areas, areas designated under the source Water Protection Program of the State or the Environmental Protection Agency, and listing of critical habitats by the Fish and Wildlife Service.
- e. Other changed legal requirements, such as changes in statutes, case law, or regulations.

**Criterion 4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the proposed action?** Explain how the methodologies and analytical approach used in the existing NEPA document(s) are current and sufficient for supporting approval of the proposed action. If valid new technologies and methodologies exist (e.g., air quality modeling), explain why it continues to be reasonable to rely on the method previously used.

**Criterion 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Does the existing NEPA document(s) analyze site-specific impacts related to the current proposed action?** Review the impact analysis in the existing NEPA document(s). Explain how the direct and indirect impacts of the proposed action are analyzed in the existing NEPA documents, and would, or would not, differ from those identified in the existing NEPA document. Consider the effect new information or circumstances may have on the environmental impacts predicted in the existing NEPA document. Consider whether the documents sufficiently analyze site-specific impacts related to the current proposed action.

**Criterion 6. Are the reasonably foreseeable cumulative impacts that would result from implementation of the proposed action substantially unchanged from those identified in the existing NEPA document(s)?** Would the current proposed action, if implemented, change the cumulative impact analysis? Consider the impact analysis in existing NEPA document(s), the effects of relevant activities that have been implemented or projected since existing NEPA documents were completed, and the effects of the current proposed action.

**Criterion 7. Is the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?** Explain how the nature of public involvement in previous NEPA documents remains in compliance with NEPA public involvement requirements in light of current conditions, information, issues, and controversies.